

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**NOTICE OF EXPEDITED MOTION OF RECEIVER FOR AN ORDER FURTHER
EXTENDING THE STAY PROVIDED IN THE RECEIVERSHIP ORDER**

PLEASE TAKE NOTICE that Michael Fuqua, as receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc., by and through his undersigned counsel, will move (the “Motion”) the Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for entry of an Order (the “Proposed Order”), substantially in the form attached as **Exhibit A**: (a) further extending the stay provided for in paragraph 4 of the *Order Appointing Michael Fuqua as Receiver* (Doc. 117) (the “Receivership Order”) through and including January 31, 2023 and (b) granting such further relief as is appropriate.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the Receiver relies upon the accompanying *Memorandum of Law* in support of the Motion and the *Declaration of Michael Fuqua, as Receiver, in Support of the Motion* (the “Fuqua Declaration”), each of which is being filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that copies of the *Memorandum of Law* and Fuqua Declaration can be obtained (i) for a fee through the Court's website at <https://www.nysb.uscourts.gov/> referencing Case No. 21 Civ. 6995 (PKC) or (ii) for free upon request directed to counsel for the Receiver, Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, Delaware 19801, Attn: Jason D. Angelo, Esq. (jangelo@reedsmith.com).

PLEASE TAKE FURTHER NOTICE that pursuant to paragraph 15 of the Receivership Order, Federal Rule of Civil Procedure 6(d), and Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposing affidavits and answering memoranda must be filed on or before **December 7, 2022**.

Dated: November 30, 2022
New York, New York

Respectfully submitted,

REED SMITH LLP

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- and -

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*Counsel for Michael Fuqua, in his capacity as
Receiver of Theia Group, Inc., Theia Aviation LLC,
and Theia Holdings A, Inc.*